

[Submitting Counsel on Signature Page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

THIS DOCUMENT RELATES TO:

ALL ACTIONS

MDL No. 3047

Case Nos. 4:22-md-03047-YGR-PHK
4:23-cv-05448-YGR

Honorable Yvonne Gonzalez Rogers

**STIPULATED AND ~~PROPOSED~~
ORDER OF DISMISSAL OF CERTAIN
META DEFENDANTS**

Pursuant to Civil L.R. 7-12, Charleston County School District, Tucson Unified School District, Board of Education of Harford County, Breathitt County Board of Education, DeKalb County School District, and Irvington Public Schools (together “Bellwethers”) and Defendants Meta Platforms, Inc.; Facebook Holdings, LLC, Facebook Operations, LLC; Meta Payments Inc.; Meta Platforms Technologies, LLC; and Siculus LLC (the “Meta Defendants”) hereby jointly submit this stipulation of dismissal, with prejudice, of the Bellwethers’ claims against certain Meta Defendants in *In re Social Media Adolescent Addiction / Personal Injury Products Liability Litigation*, MDL No. 3047 and Bellwethers’ constituent cases¹ (together, “this Matter”).

Bellwethers and Meta Defendants agree and stipulate as follows:

1. Meta Platforms Inc. stipulates that it is the corporate parent of Facebook Holdings, LLC; Facebook Operations, LLC; Meta Payments Inc. (*fka* Facebook Payments Inc.); Meta Platforms Technologies, LLC (*fka* Facebook Technologies, LLC); and Siculus LLC (*fka* Siculus Inc.) (together, the “Meta Subsidiaries”).

2. Meta Platforms Inc. agrees not to assert as a defense to liability in this Matter that it is not responsible for any actions or inactions alleged by Bellwethers as wrongful on the grounds that such actions or inactions were taken in whole or in part by any or all of the Meta Subsidiaries.

3. Meta Platforms Inc. agrees not to assert as a basis for resisting payment of any monetary judgment or resisting compliance with any court order mandating injunctive or equitable relief that it does not exercise control or ownership over the assets of the Meta subsidiaries.

4. In consideration of the foregoing, Bellwethers’ claims against the Meta Subsidiaries in the Matter shall be, and hereby are, dismissed with prejudice pursuant to Federal Rule of Civil Procedure 41(a), with each party to bear its own costs and attorneys’ fees.

¹ Bellwethers’ constituent cases are: *Board of Education of Harford County v. Meta Platforms, Inc., et al.*, 23-cv-03065; *DeKalb County School District v. Meta Platforms, Inc., et al.*, 4:25-cv-02310; *Breathitt County Board of Education v. Meta Platforms, Inc., et al.*, 4:23-cv-01804; *Irvington Public Schools v. Meta Platforms, Inc. et al.*, 4:23-cv-01467; *Tucson Unified School District v. Meta Platforms, Inc., et al.*, 4:24-cv-01382; and *Charleston County School District v. Meta Platforms, Inc., et al.*, 4:23-cv-04659.

1 Dated: November 7, 2025

COVINGTON & BURLING LLP

2 By: /s/ Ashley M. Simonsen
3 Ashley M. Simonsen, SBN 275203
4 COVINGTON & BURLING LLP
5 1999 Avenue of the Stars
6 Los Angeles, CA 90067
7 Telephone: (424) 332-4800
8 Facsimile: + 1 (424) 332-4749
9 Email: asimonsen@cov.com

10 Phyllis A. Jones, *pro hac vice*
11 Paul W. Schmidt, *pro hac vice*
12 COVINGTON & BURLING LLP
13 One City Center
14 850 Tenth Street, NW
15 Washington, DC 20001-4956
16 Telephone: + 1 (202) 662-6000
17 Facsimile: + 1 (202) 662-6291
18 Email: pajones@cov.com

19 DAVIS POLK & WARDWELL LLP
20 James P. Rouhandeh, *pro hac vice*
21 Antonio J. Perez-Marques, *pro hac vice*
22 Caroline Stern, *pro hac vice*
23 Corey M. Meyer, *pro hac vice*
24 DAVIS POLK & WARDWELL LLP
25 450 Lexington Avenue
26 New York, New York 10017
27 Telephone: (212) 450-4000
28 Facsimile: (212) 701-5800
rouhandeh@davispolk.com
antonio.perez@davispolk.com
caroline.stern@davispolk.com
corey.meyer@davispolk.com

*Attorney for Defendants Meta Platforms, Inc.
f/k/a Facebook, Inc.; Facebook Holdings,
LLC; Facebook Operations, LLC; Facebook
Payments, Inc.; Facebook Technologies, LLC;
and Siculus, Inc.*

1
2 /s/ Previn Warren

PREVIN WARREN (*pro hac vice*)
MOTLEY RICE LLC
401 9th Street NW Suite 630
Washington DC 20004
Telephone: 202-386-9610
pwarren@motleyrice.com

6 *Co-Lead Counsel for the School District Plaintiffs*
7 *Attorney for Plaintiff Charleston County School District*

8
9 /s/ Davis Vaughn

Davis Vaughn (*pro hac vice*)
BEASLEY ALLEN CROW METHVIN
PORTIS & MILES, P.C.
234 Commerce Street
Montgomery, AL 36103
Tel.: 334-269-2343
davis.vaughn@beasleyallen.com

13
14 *Attorney for Plaintiff Dekalb County School District*

15
16 /s/ Matthew P. Legg

Matthew P. Legg (*pro hac vice*)
BROCKSTEDT MANDALAS FEDERICO LLC
2850 Quarry Lake Drive, Suite 220
Baltimore, MD 21209
410-421-7777
mlegg@lawbmf.com

20 *Attorney for Plaintiff Board of Education of Harford*
21 *County*

22
23 /s/ Austin Brane

Austin Brane, SBN 286227
WAGSTAFF & CARTMELL LLP
4740 Grand Avenue, Suite 300
Kansas City, MO 64112
Tel: (816) 701-1100
abrane@wcllp.com

26
27 *Attorney for Plaintiff Tucson Unified School District*
28

/s/ Ronald E. Johnson, Jr.

Ronald E. Johnson, Jr. (*pro hac vice*)
HENDY JOHNSON VAUGHN EMERY PSC
600 WEST MAIN STREET, SUITE 100
LOUISVILLE, KY 40202
Telephone: 859-578-4444
rjohnson@justicestartshere.com

*Attorney for Plaintiff Breathitt County Board of
Education*

By: /s/James E. Cecchi

JAMES E. CECCHI
MICHAEL A. INNES
DAVID G. GILFILLAN
CARELLA, BYRNE, CECCHI,
BRODY & AGNELLO, P.C.
5 Becker Farm Road
Roseland, New Jersey 07068
T: 973.994.1700
F: 973.994.1744

ZACHARY S. BOWER
CARELLA, BYRNE, CECCHI,
BRODY & AGNELLO, P.C.
2222 Ponce De Leon Blvd.
Miami, Florida 33134

Attorneys for Plaintiff Irvington Public Schools

~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

November 7, 2025

A handwritten signature in black ink, appearing to read "Yvonne Gonzalez Rogers", is written over a horizontal line.

The Honorable Yvonne Gonzalez Rogers
United States District Judge